Virginia Title V Operating Permit

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Transprint USA
Facility Name:	Transprint USA
Facility Location:	1000 Pleasant Valley Road, Harrisonburg, VA
Registration Number:	80926
Permit Number:	VRO80926

February 14, 2005

Effective Date

February 13, 2010

Expiration Date

Director, Department of Environmental Quality

February 1, 2005 Signature Date

Table of Contents, 2 pages
Permit Conditions, 60 pages
Attachment A (40 CFR 63 Subpart KK)
Attachment B (40 CFR 63 Subpart N)
Attachment C (40 CFR 63 Subpart DDDDD)

Source Testing Report Format

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I. Facility Information

Permittee

Transprint USA 1000 Pleasant Valley Road Harrisonburg, Virginia 22801

Responsible Official

Robert Fellows Vice President

Facility

Transprint USA 1000 Pleasant Valley Road Harrisonburg, Virginia 22801

Contact person

Robert Fellows Vice President, Research and Development (540) 433-9101

AFS Identification Number: 51-165-0106

Facility Description:

NAICS Code 323111 (Commercial Gravure Printing) (formerly SIC Code 2754):

Transprint's primary process is rotogravure printing of designs on transfer paper, which is subsequently sold to textile manufacturers for use on clothing or upholstery fabrics. The printing operations are supported by the following processes:

NAICS Codes 332813 (Electroplating, Plating, Polishing, Anodizing, and Coloring) and 323122 (Prepress Services) (formerly SIC Codes 3471 and 2796):

Chromium electroplating and engraving; hard chromium electroplating of rotogravure cylinders for use in presses. Silver, copper, and nickel electroplating is also conducted, as well as polishing and engraving operations.

NAICS Code 32591 (Printing Ink Manufacturing) (formerly SIC Code 2893):

Mixing of pigments and solvents to produce release inks for use in rotogravure printing operations (on-site only).

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II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burni	ing Equipme	ent					
B1	S6	Kewanee Boiler Corporation, December 1976	10.5 MMBtu/hr	-	-	-	
B2	S7	Kewanee Boiler Corporation, December 1976	10.5 MMBtu/hr	-	-	-	
Miscellane	eous Printing	g Operations				_	
P6	S1, S4	Geo Moulton Successor proof presses (5)	30 meters/hr each	TEC Systems 20500 catalytic afterburner	CD1	VOC, VHAPs	3/31/03
P7	S2	Renzmann parts washers (2)	25.6 lbs solvent/hr (total)	TEC Systems 30000 catalytic afterburner	CD2	VOC, VHAPs	3/31/03
Rotogravu	re Printing l	Presses					
P1	S1	Nakajima 6-station rotogravure printing press	7,200 meters/hr	TEC Systems 20500 catalytic afterburner	CD1	VOC, VHAPs	3/31/03
P2	S1	Windmoeller and Holsher 8-station rotogravure printing press	9,600 meters/hr	TEC Systems 20500 catalytic afterburner	CD1	VOC, VHAPs	3/31/03
Р3	S2	Andreotti 10-station rotogravure printing press	5,000 meters/hr	TEC Systems 30000 catalytic afterburner	CD2	VOC, VHAPs	3/31/03

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
P4	S2	Windmoeller and Holsher 10- station rotogravure printing press	5,000 meters/hr	TEC Systems 30000 catalytic afterburner	CD2	VOC, VHAPs	3/31/03
P5	S3	10-station rotogravure printing press (not yet constructed-permit valid through 9/15/05)	9,600 meters/hr	catalytic afterburner	CD3	VOC, VHAPs	3/31/03
Release Inl	Production	n					
RI		Release ink production process	one 190-gallon fully- covered mix tank; storage tanks and drums each not exceeding 250 gallons in capacity	-	-	-	3/31/03
Chromium	Chromium Electroplating						
E42	S8	Acigraf enclosed hard chromium electroplating tank	1000 Ampere-hours/hr	KCH Services, Inc. PVC Spectra U-IV-2 composite mesh pad mist eliminator	CD4	Hexavalent chromium, PM-10	10/20/04
E53	S8	Acigraf enclosed hard chromium electroplating tank	1000 Ampere-hours/hr	KCH Services, Inc. PVC Spectra U-IV-2 composite mesh pad mist eliminator	CD4	Hexavalent chromium, PM-10	10/20/04

^{*} The Size/Rated capacity is provided for informational purposes only and is not an applicable requirement.

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III. Fuel Burning Equipment Requirements - Emission Unit ID#s B1 and B2

The following terms and conditions include notification requirements from 40 CFR Part 63 Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters). A current copy of 40 CFR Part 63 Subpart DDDDD has been attached. All terms used in conditions derived from 40 CFR 63 Subpart DDDDD shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.7575.

A. Limitations

1. The approved fuels for the two boilers are natural gas and propane. A change in the fuels may require a permit to modify and operate.

2. Visible emissions from each of the two boiler stacks shall not exceed twenty (20) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity.

3. Boiler emissions shall be controlled by proper operation and maintenance. Operators shall be trained in the proper operation of all such equipment. Training shall consist of a review of and familiarization with the manufacturer's operating instructions, at minimum. The permittee shall have available written operating procedures and a maintenance schedule for the boilers. These procedures shall be based on the manufacturer's recommendations, at minimum.

B. Monitoring and Recordkeeping

The permittee shall maintain records of the following:

- 1. Purchase records for the fuels combusted in the boilers (B1 and B2);
- 2. The required boiler operator training including a statement of time, place and nature of training provided.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

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C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
Visible Emissions	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

The permittee shall provide an initial notification to the Director, Valley Regional Office, according to 40 CFR 63.7506(b)(1) and 40 CFR 63.9(b), by March 12, 2005. The notification shall contain the following information:

- 1. The name and address of the owner or operator;
- 2. The address (i.e., physical location) of the affected source;
- 3. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
- 4. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
- 5. A statement of whether the affected source is a major source or an area source.

A copy of the notification shall be sent to the U.S. Environmental Protection Agency (EPA) at the following address:

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Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110, 40 CFR 63.7506(b)(1) and 40 CFR 63.9(b)(2))

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IV. Miscellaneous Printing Operations Requirements - Emission Unit ID#s P6 - P7

Limitations, monitoring, recordkeeping, and reporting requirements for the catalytic incinerators (CD1 and CD2) controlling emissions from miscellaneous printing operations are included in Part V of the permit. CD1 and CD2 also control emissions from rotogravure operations.

A. Limitations

- 1. Volatile organic compound (VOC) emissions from the five proof printing machines (P6) shall be controlled by a 70% efficient capture system and a catalytic incinerator (CD1) having a 95% VOC destruction efficiency. The proof printing machines shall be provided with adequate access for inspection.
 - (9 VAC 5-80-110 and Condition 4 of 3/31/03 Permt)
- VOC emissions from the two Renzmann parts washers (P7) shall be controlled by a 100% efficient capture system and a catalytic incinerator (CD2) having a 95% VOC destruction efficiency. The two Renzmann parts washers shall be provided with adequate access for inspection.
 - (9 VAC 5-80-110 and Condition 5 of 3/31/03 Permit)
- 3. The throughput of VOCs shall not exceed the limitations specified below:

Proof printing

machines (P6) 14.4 lbs/hr 45 tons/yr

Parts washers (P7) and

press cleaning 98.0 lbs/hr 300 tons/yr

Cleaning outside

the enclosures 6.4 lbs/hr 20 tons/yr

Annual throughput limitations shall be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 9 of 3/31/03 Permit)

4. VOC emissions shall not exceed the limits specified below:

Proof printing

machines (P6) 4.8 lbs/hr 15.1 tons/yr

Parts washers (P7) and

press cleaning 4.9 lbs/hr 15.0 tons/yr

Cleaning outside

the enclosures 6.4 lbs/hr 20.0 tons/yr

Annual emissions shall be calculated as the sum of each consecutive 12-month period. (9 VAC 5-80-110 and Condition 11 of 3/31/03 Permit)

B. Monitoring

1. Compliance with the hourly VOC throughput limits in Condition IV.A.3 shall be determined by calculating the VOC throughput each calendar month as follows:

$$T = S \underbrace{M_i W_i}_{i=1} x 2000$$

Where

T = VOC throughput in pounds per hour

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

H = total hours of operation of each press or of cleaning operations during the calendar month

2. Compliance with each annual VOC throughput limit in Condition IV.A.3 shall be determined by calculating the VOC throughput each calendar month as follows:

$$\begin{array}{c} n \\ T = ? \ M_i W_i \\ i = 1 \end{array}$$

Where

T = VOC throughput in tons

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

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3. Compliance with the hourly VOC emissions limits in Condition IV.A.4 shall be determined by calculating VOC emissions each calendar month as follows:

$$\begin{array}{c} n \\ E=? \ \underline{M_i W_i (1\text{-OCE})} \quad X \quad 2000 \\ i=1 \quad H \end{array}$$

Where

E = VOC emissions in pounds per hour

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

H = total hours of operation of each press or of cleaning operations during the calendar month

OCE = overall control efficiency (the product of capture efficiency and control device destruction efficiency)

The control device capture and destruction efficiencies used in the equation shall be the required efficiencies in Conditions IV.A.1 and IV.A.2 or the efficiencies demonstrated in the most recent performance tests conducted according to 40 CFR 51, Appendix M, Method 204 or DEQ-approved alternative method (capture efficiency) or 40 CFR 60, Appendix A, Method 25 or 25A (destruction efficiency). If such testing indicates a capture or destruction efficiency below that required by Conditions IV.A.1 or IV.A.2, the lower efficiency shall be used to calculate emissions. The capture efficiency value used in calculating emissions for presses meeting the criteria for permanent total enclosure (Condition V.A.3) shall be 100 per cent. The VOC content of ink as supplied shall be based on certified manufacturers formulation data. If manufacturers formulation data report VOC content as a range, the maximum value in the range shall be used in calculating emissions.

4. Compliance with each annual VOC emission limit in Condition IV.A.4 shall be determined by calculating VOC emissions each calendar month as follows:

$$\begin{split} n \\ E = S \ M_i W_i (1\text{-OCE}) \\ i = 1 \end{split}$$

Where

E = VOC emissions in tons

M = total mass (tons) of each solvent or ink (i) as applied during the

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calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied OCE = overall control efficiency (the product of capture efficiency and control device destruction efficiency)

The control device capture and destruction efficiencies used in the equation shall be the required efficiencies in Conditions IV.A.1 and IV.A.2 or the efficiencies demonstrated in the most recent performance tests conducted according to 40 CFR 51, Appendix M, Method 204 or DEQ-approved alternative method (capture efficiency) or 40 CFR 60, Appendix A, Method 25 or 25A (destruction efficiency). If such testing indicates a capture or destruction efficiency below that required by Conditions IV.A.1 or IV.A.2, the lower efficiency shall be used to calculate emissions. The capture efficiency value used in calculating emissions for presses meeting the criteria for permanent total enclosure (Condition V.A.3) shall be 100 percent. The VOC content of ink as supplied shall be based on certified manufacturers formulation data. If manufacturers formulation data report VOC content as a range, the maximum value in the range shall be used in calculating emissions.

(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- 1. Hours of operation for the proof printing machines (P6), parts washers (P7), press cleaning operations, and cleaning outside the enclosures;
- 2. Monthly material balance of VOC used at the facility, to include:

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- a. Throughput (tons) of VOC used in proof printing (P6);
- b. Throughput (tons) of VOC used in the Renzmann parts washers (P7) and press cleaning;
- c. Throughput (tons) of VOC used in cleaning outside the enclosures;
- d. Throughput (tons) of VOC recovered or disposed of off site;
- e. Monthly calculation of hourly and rolling 12-month VOC throughputs;
- f. Monthly calculation of hourly and rolling 12-month VOC emissions;
- 3. Certified MSDS or VOC Data Sheet showing VOC content as supplied for each ink used;
- 4. Results of performance tests conducted on catalytic incinerators (CD1 and CD2) to determine the destruction efficiency used in emission calculation formulas in Conditions IV.B.3 and IV.B.4;
- 5. Results of capture efficiency testing for the proof printing machines (P6).

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years may be retained off site. Such files may be maintained on microfilm, computer, computer floppy disks, magnetic tape disks, or microfiche.

(9 VAC 5-80-110 and Condition 20 of 3/31/03 Permit)

D. Testing

- 1. EPA Method 204 (40 CFR 51, Appendix M) or DEQ-approved alternative testing of capture efficiency for the proof printing machines (P6) shall be conducted if the process or enclosure is modified such that capture efficiency may be reduced.
 - (9 VAC 5-80-110)
- 2. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations.
 - (9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 14 of 3/31/03 Permit)

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3. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60 Appendix A)
VOC	Methods 18, 25, 25a
VOC content	Methods 24, 24a
Visible Emission	Method 9

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit reports to the Director, Valley Region, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 - March 31	June 1
April 1 – June 30	September 1
July 1 – September 30	December 1
October 1 – December 31	March 1

The reports due on March 1 and September 1 shall be submitted with the semi-annual report required by Condition X.C.3.

(9 VAC 5-80-110 and Condition 21 of 3/31/03 Permit)

- 2. Each quarterly report shall document the following:
 - a. The monthly and rolling 12-month throughput in tons of total VOC used in the proof printing machines, parts washers, press cleaning and cleaning outside the enclosures;
 - b. The monthly and rolling 12-month weight in tons of total VOC recovered or disposed of offsite.

(9 VAC 5-80-110 and Condition 21 of 3/31/03 Permit)

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V. Rotogravure Printing Press Requirements - Emission Unit ID#s P1 - P5

The following terms and conditions include requirements of 40 CFR Part 63 Subpart KK for product and packaging rotogravure facilities, which is applicable to P1 - P5. A current copy of 40 CFR Part 63 Subpart KK has been attached. All terms used in conditions derived from 40 CFR 63 Subpart KK shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.822. Please note that, as used in Part V, "process equipment" means rotogravure press, "air pollution control device" means catalytic incinerator and related capture system, and "continuous monitoring system" refers to both devices monitoring the control system and those monitoring the capture system.

A. Limitations

- VOC, including hazardous air pollutant (HAP), emissions from the five rotogravure printing presses (P1 P5) shall be controlled by permanent total enclosures and catalytic incinerators having a 95% VOC destruction efficiency. The printing presses and catalytic incinerators shall be provided with adequate access for inspection.
 (9 VAC 5-80-110, 40 CFR 63.825(b), 40 CFR 63.825(b)(7), and Condition 3 of 3/31/03 Permit)
- The catalytic incinerators (CD1, CD2, and CD3) shall maintain a minimum catalyst bed inlet temperature of 550°F and a retention time of at least 0.24 seconds.
 (9 VAC 5-80-110 and Condition 6 of 3/31/03 Permit)
- 3. The total enclosures for Press Nos. 1 5 (P1 P5) shall meet the following criteria:
 - Any natural draft openings shall be at least four equivalent opening diameters from each VOC emitting point;
 - b. The total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
 - d. All access doors and windows shall be closed during routine operation of the presses.

(9 VAC 5-80-110, 40 CFR 63.825(b)(7), and Condition 7 of 3/31/03 Permit)

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The approved fuels for the catalytic incinerators (CD1, CD2, and CD3) are natural gas and liquid propane gas. A change in the fuels may require a permit to modify and operate.
 (9 VAC 5-80-110 and Condition 8 of 3/31/03 Permit)

5. The throughput of VOCs used in print production (excluding cleaning) shall not exceed the limitations specified below:

Press Nos. 1-4 (P1 - P4) 1,193.6 lbs/hr 1,210 tons/yr

Press No. 5 (P5) 298.5 lbs/hr 280 tons/yr

Annual limitations apply to the combined throughputs to Press Nos. 1 - 4 (P1 - P4) and to the throughput to Press No. 5 (P5) individually. Annual throughput shall be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 9 of 3/31/03 Permit)

6. VOC emissions from print production (excluding cleaning) shall not exceed the limits specified below:

Press Nos. 1-4 (P1 - P4) 59.7 lbs/hr 60.5 tons/yr

Press No. 5 (P5) 14.9 lbs/hr 14.0 tons/yr

Annual limitations apply to the combined emissions from Press Nos. 1 - 4 (P1 - P4) and to the emissions from Press No. 5 (P5) individually. Annual emissions shall be calculated as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 11 of 3/13/03 Permit)

7. Visible emissions from the stacks of the catalytic incinerators (CD1, CD2, and CD3) shall not exceed five percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110, 9 VAC 5-50-80, and Condition 12 of 3/13/03 Permit)

8. The permittee shall develop and implement a written startup, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) that describes, in detail, procedures for operating and maintaining the rotogravure presses (P1 - P5) during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the control efficiency requirements in Condition V.A.1. As required under 40 CFR 63.8(c)(1)(i), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the rotogravure

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presses (P1 - P5), including associated air pollution control equipment, in accordance with the procedures specified in the startup, shutdown, and malfunction plan.

(9 VAC 5-80-110, 40 CFR 63.6(e)(3), and 40 CFR 63.8(c)(1)(i))

9. Authorization to install and operate Press No. 5 (P5) shall become invalid if construction of Press No. 5 (P5) is not commenced by September 15, 2005, or if it is discontinued for a period of eighteen (18) months.

(9 VAC 5-80-110, 9 VAC 5-80-1210 and DEQ letter dated March 15, 2004)

- 10. The temperature monitoring device for the catalytic incinerator (CD3) shall be installed and operational prior to conducting initial performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation and calibration of the device.
 - (9 VAC 5-80-110 and Condition 17 of 3/31/03 Permit)
- 11. Operation of the four-station Windmoeller and Holsher press, or use of its parts to modify another press, may require a permit.

(9 VAC 5-80-110 and Condition 15 of 3/31/03 Permit)

B. Monitoring

1. Compliance with the hourly VOC throughput limits in Condition V.A.5 shall be determined by calculating the VOC throughput each calendar month as follows:

$$\begin{array}{c}
 n \\
 T = ? \underline{M_i W_i} \underline{\quad} x \ 2000 \\
 i = 1 \ H
 \end{array}$$

Where

T = VOC throughput in pounds per hour

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

H = total combined hours of operation of Press Nos. 1 - 4 (P1 - P4) or the total hours of operation of Press No. 5 (P5) during the calendar month

(9 VAC 5-80-110)

2. Compliance with each annual VOC throughput limit in Condition V.A.5 shall be determined by calculating the VOC each calendar month as follows:

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$$\begin{aligned} n \\ T &= SM_iW_i \\ i &= 1 \end{aligned}$$

Where

T = VOC throughput in tons

M = total mass (tons) of each solvent or ink (i) as applied during the calendar

W = weight fraction of VOC in each solvent or ink (i), as applied

3. Compliance with the hourly VOC emissions limits in Condition V.A.6 shall be determined by calculating VOC emissions each calendar month as follows:

$$\label{eq:energy} \begin{array}{ll} n \\ E = ? \ \underline{M_i W_i (1 - OCE)} & X & 2000 \\ i = 1 & H \end{array}$$

Where

E = VOC emissions in pounds per hour

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

H = total combined hours of operation for Press Nos. 1 - 4 (P1 - P4) or the total hours of operation of Press No. 5 (P5) during the calendar month

OCE = overall control efficiency (the product of capture efficiency and control device destruction efficiency)

The control device capture and destruction efficiencies used in the equation shall be the efficiencies demonstrated in the most recent performance tests conducted according to 40 CFR 51, Appendix M, Method 204 (capture efficiency) or 40 CFR Part 60, Appendix A, Method 25 or 25A (destruction efficiency). The capture efficiency value used in calculating emissions for presses meeting the criteria for permanent total enclosure (Condition V.A.3) shall be 100 percent. The VOC content of ink as supplied shall be based on certified manufacturers' formulation data.

(9 VAC 5-80-110)

4. Compliance with each annual VOC emission limit in Condition V.A.6 shall be determined by calculating VOC emissions each calendar month as follows:

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$$E = ? M_iW_i(1 - OCE)$$

$$i=1$$

Where

E = VOC emissions in tons

M = total mass (tons) of each solvent or ink (i) as applied during the calendar month

W = weight fraction of VOC in each solvent or ink (i), as applied

OCE = overall control efficiency (the product of capture efficiency and control device destruction efficiency)

The control device capture and destruction efficiencies used in the equation shall be the efficiencies demonstrated in the most recent performance tests conducted according to 40 CFR 51, Appendix M, Method 204 (capture efficiency) or 40 CFR Part 60, Appendix A, Method 25 or 25A (destruction efficiency). The capture efficiency value used in calculating emissions for presses meeting the criteria for permanent total enclosure (Condition V.A.3) shall be 100 percent. The VOC content of ink as supplied shall be based on certified manufacturers formulation data. (9 VAC 5-80-110)

- 5. The catalytic incinerators (CD1, CD2, and CD3) shall be equipped with devices to continuously measure temperature before the catalyst bed. The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
 - (9 VAC 5-80-110, 40 CFR 63.828(a)(4)(ii), and Condition 6 of 3/31/03 Permit)
- 6. The enclosures surrounding Press Nos. 1 5 (P1 P5) shall be equipped with devices to continuously monitor a parameter indicative of capture efficiency. The parameter value, or range of values, necessary to maintain the required capture efficiency shall be determined during the performance testing prescribed in Conditions V.D.2, V.D.3, and V.D.4. (9 VAC 5-80-110, 40 CFR 63.825(d)(1), and 40 CFR 63.828(a)(5)(ii))
- 7. Each temperature monitoring device shall be capable of monitoring temperature with an accuracy of +/- one (1) percent of the temperature being monitored in degrees Celsius or +/- one (1) degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet. (9 VAC 5-80-110 and 40 CFR 63.828(a)(4)(ii))

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8. All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(9 VAC 5-80-110 and 40 CFR 63.828(a)(2)(ii))

- 9. The permittee shall maintain and operate each continuous monitoring system (CMS) in a manner consistent with good air pollution control practices.
 - a. The permittee shall ensure the immediate repair or replacement of CMS parts to correct "routine" or otherwise predictable CMS malfunctions as defined in the startup, shutdown, and malfunction plan required by Condition V.A.8. The permittee shall keep the necessary parts for routine repairs of the affected equipment readily available.
 - b. The determination of the Director, Valley Region of whether acceptable operation and maintenance procedures are being used will be based on information that may include, but is not limited to, review of operation and maintenance procedures, operation and maintenance records, manufacturing recommendations and specifications, and inspection of the CMS. Operation and maintenance procedures written by the CMS manufacturer and other guidance also can be used to maintain and operate each CMS.

(9 VAC 5-80-110 and 40 CFR 63.8(c))

- 10. The permittee shall develop and implement a CMS quality control program. As part of the quality control program, the permittee shall develop and submit to the Director, Valley Region for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in Condition V.D.6, according to procedures specified in 40 CFR 63.8(e). In addition, each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:
 - a. Initial and any subsequent calibration of the CMS;
 - b. Determination and adjustment of the calibration drift of the CMS;
 - c. Preventive maintenance of the CMS, including spare parts inventory;
 - d. Data recording, calculations, and reporting;
 - e. Accuracy audit procedures, including sampling and analysis methods; and

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f. Program of corrective action for a malfunctioning CMS.

The permittee shall keep these written procedures on record for the life of the rotogravure presses (P1 - P5) or until the presses are no longer subject to the provisions of 40 CFR 63, to be made available for inspection, upon request, by DEQ. If the performance evaluation plan is revised, the permittee shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by DEQ, for a period of 5 years after each revision to the plan. Where relevant, e.g., program of corrective action for a malfunctioning CMS, these written procedures may be incorporated as part of the startup, shutdown, and malfunction plan to avoid duplication of planning and recordkeeping efforts.

(9 VAC 5-80-110 and 40 CFR 63.8(d))

11. The permittee shall perform weekly inspections of the catalytic incinerator (CD1, CD2, and CD3) stacks to determine the presence of visible emissions. If during the inspection, or at any other time, visible emissions are observed, an EPA Method 9 (40 CFR 60, Appendix A) visible emission evaluation (VEE) shall be conducted by a certified observer. The VEE shall be conducted for a minimum period of six (6) minutes. If any of the observations exceed five per cent opacity, the observation period shall continue until sixty (60) minutes of observation have been completed. If the sixty-minute VEE indicates a violation of the standard, corrective action shall be taken.

(9 VAC 5-80-110)

C. Recordkeeping

- The permittee shall maintain records of all emission data and operating parameters
 necessary to demonstrate compliance with this permit. The content of and format of such
 records shall be arranged with the Director, Valley Region. These records shall include, but
 are not limited to
 - a. Hours of operation for each press (P1 P5);
 - b. Monthly material balance of VOC used at the facility, to include:
 - (1) Throughput (tons) of VOC used in each press (P1 P5);
 - (2) Throughput (tons) of VOC recovered or disposed of off site;
 - (3) Monthly calculation of hourly and rolling 12-month VOC throughputs;
 - (4) Monthly calculation of hourly and rolling 12-month VOC emissions;

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- c. Purchase records for fuels used in the catalytic incinerators (CD1- CD3);
- d. Certified MSDS or VOC Data Sheet showing VOC content as supplied for each ink;
- Results of performance tests conducted on catalytic incinerators (CD1 CD3) to determine the destruction efficiency used in emission calculation formulas in Conditions V.B.3 and V.B.4;
- f. EPA Method 204 (40 CFR 51, Appendix M) test results demonstrating that the requirements of Condition V.A.3 (permanent total enclosure criteria) are met;
- g. Results from weekly inspections of printing press (incinerator) stacks (Stack #s 1 -3), to include:
 - (1) The date, time, and name of person performing each inspection;
 - (2) Whether or not visible emissions were observed;
 - (3) EPA Method 9 (40 CFR 60, Appendix A) observation record, if applicable; and
 - (4) If an exceedance of the five (5%) percent opacity standard is determined by a sixty-minute EPA Method 9 (40 CFR 60, Appendix A) observation, a description of the corrective action taken.
- h. The incinerators (CD1, CD2, and CD3) manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years may be retained off site. Such files may be maintained on microfilm, computer, computer floppy disks, magnetic tape disks, or microfiche.

 (9 VAC 5-80-110, Condition 20 of 3/31/03 Permit, and 40 CFR 63.10(b)(1))
- 2. For the rotogravure presses (P1 P5), the permittee shall maintain records of the following:
 - a. The occurrence and duration of each startup, shutdown, or malfunction of process equipment;
 - b. The occurrence and duration of each malfunction of the air pollution control equipment;
 - c. All maintenance performed on the air pollution control equipment;

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- d. Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the startup, shutdown, and malfunction plan required by Condition V.A.8;
- e. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist" or other effective form of recordkeeping;
- f. Each period in which a CMS is malfunctioning or inoperative (including out-of-control periods);
- g. All required measurements needed to demonstrate compliance with the control efficiency requirements in Condition V.A.1 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report);
- h. All results of performance tests and CMS performance evaluations;
- i. All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
- j. All CMS calibration checks;
- k. All adjustments and maintenance performed on CMS;
- l. All documentation supporting initial notifications and notifications of compliance status.

Such records shall be maintained in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years may be retained off site. Such files may be maintained on microfilm, computer, computer floppy disks, magnetic tape disks, or microfiche. (9 VAC 5-80-110, 40 CFR 63.829(b)(1), 40 CFR 63.6(e)(3), and 40 CFR 63.10(b)(2))

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3. The permittee shall keep the written startup, shutdown, and malfunction plan required by Condition V.A.8 on record after it is developed to be made available for inspection, upon request, by the Director, Valley Region or by the U. S. Environ-mental Protection Agency (EPA), for the life of the rotogravure presses (P1 - P5) or until the rotogravure presses are no longer subject to the provisions of 40 CFR 63. In addition, if the startup, shutdown, and malfunction plan is revised, the permittee shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Director, Valley Region or by EPA, for a period of 5 years after each revision to the plan.

(9 VAC 5-80-110 and 40 CFR 63.6(e)(3))

- 4. For the rotogravure presses (P1 P5), the permittee shall maintain records related to the CMS of the following:
 - a. All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of control periods);
 - b. The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - c. The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);
 - d. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in 40 CFR 63 Subpart KK, that occurs during startups, shutdowns, and malfunctions;
 - e. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in 40 CFR 63 Subpart KK, that occurs during periods other than startups, shutdowns, and malfunctions;
 - f. The nature and cause of any malfunction (if known);
 - g. The corrective action taken or preventative measures adopted;
 - h. The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
 - i. The total process operating time during the reporting period, and

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j. All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d).

In order to satisfy Conditions f, g, and h above, and to avoid duplicative recordkeeping efforts, the permittee may use the startup, shutdown, and malfunction plan or records kept to satisfy the recordkeeping requirements of the startup, shutdown, and maintenance plan specified in Conditions V.C.2.

Such records shall be maintained in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years may be retained off site. Such files may be maintained on microfilm, computer, computer floppy disks, magnetic tape disks, or microfiche. (9 VAC 5-80-110, 40 CFR 63.829(b)(3), and 40 CFR 63.10(c))

D. Testing

- The process equipment shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods.
 (9 VAC 5-80-110 and Condition 14 of 3/31/03 Permit)
- 2. Initial performance tests shall be conducted for VOCs from the catalytic incinerator (CD3) serving Press No. 5 (P5) to determine compliance with the emission limits and destruction efficiency contained in Conditions V.A.6 and V.A.1, respectively. For purposes of demonstrating compliance with 40 CFR 63 Subpart KK, VOC destruction efficiency will be considered equal to organic HAP destruction efficiency. The tests shall be performed, and demonstrate compliance, within 60 days after achieving the maximum production rate but in no event later than 180 days after start up of the press (P5). Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 of State Regulations, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410 and 9 VAC 5-60-100. The details of the tests are to be arranged with the Director, Valley Region. The permittee shall notify the Director, Valley Region, in writing of the intention to conduct the performance test at least 60 calendar days before the performance test is scheduled to begin. A copy of the notification shall be submitted to the EPA at the address below. In the event that the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond the permittee's control, the permittee shall notify the Director, Valley Region, within five (5) days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. The notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other

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applicable Federal, State, or local requirements, nor will it prevent the Director, Valley Region, from implementing enforcement action. The permittee shall submit a test protocol at least thirty (30) days prior to testing. Two (2) copies of the test results shall be submitted to the Director, Valley Region, within 45 days after test completion and shall conform to the test report format enclosed with this permit. A copy of the test results shall also be submitted to the EPA at the following address no later than 90 calendar days after test completion and shall be included as part of the notification of compliance status as required by Condition V.E.4.

U.S. EPA, Region III Air Protection Division (3AP00) ATTN: Printing and Publishing NESHAP Coordinator 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

(9 VAC 5-80-110, 40 CFR 63.7(b), 40 CFR 63.825(d), 40 CFR 63.830(b)(2), and Condition 16 of 3/31/03 Permit)

3. Concurrently with performance testing performed according to Condition V.D.2, capture efficiency of the enclosures surrounding Press Nos. 5 (P5) shall be verified by Reference Method 204 (40 CFR 51, Appendix M) to confirm that the enclosure meets the requirements for permanent total enclosure. A copy of the verification results shall be submitted to the Director, Valley Region, within 45 days after test completion. A copy shall also be provided to EPA at the address in Condition V.D.2.

(9 VAC 5-80-110 and 40 CFR 63.827(e))

 The verification required by Condition V.D.3 shall be repeated if the process or enclosure is modified such that capture efficiency may be affected.
 (9 VAC 5-80-110)

- 5. Concurrent with the performance test required by Condition V.D.2, the permittee shall conduct a performance evaluation of the CMS on the capture and control devices serving Press No. 5 (P5). The performance evaluation shall be conducted in accordance with the applicable performance specification in 40 CFR 63.828 and according to the following specifications:
 - a. The permittee shall notify the Director, Valley Region in writing of the date of the performance evaluation simultaneously with the notification of the performance test dates required by Condition V.D.2. A copy of the notification shall be sent to EPA at the address in Condition V.D.2.

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b. If requested by DEQ or EPA, the permittee shall develop and submit a site-specific performance evaluation test plan before conducting a required CMS performance evaluation, in accordance with 40 CFR 63.8(e)(3).

(9 VAC 5-80-110 and 40 CFR 63.8(e)(3))

- 6. During every fifth calendar year following the date of October 31, 1994, the permittee shall perform stack emissions testing on the incinerators serving Press Nos. 1 4 (P1 P4) to demonstrate compliance with the destruction efficiency specified in Condition V.A.1. The permittee shall also perform stack emissions testing for the incinerator serving Press No. 5 (P5) during every fifth calendar year following startup to determine compliance with the destruction efficiency in Condition V.A.1. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-60-100. The details of the tests are to be arranged with the Director, Valley Region.
 - (9 VAC 5-80-110 and Condition 18 of 3/31/03 Permit)
- 7. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
VOC 40 CFR Part 60, Appendix A, Methods 18, 25,	
VOC content 40 CFR Part 60, Appendix A, Methods 24, 2-	
HAP content 40 CFR Part 63, Appendix A, Method 311	
Visible Emission	40 CFR Part 60, Appendix A, Method 9

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit reports to the Director, Valley Region, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date	
January 1 - March 31	June 1	
April 1 - June 30	September 1	
July 1 – September 30	December 1	
October 1 - December 31	March 1	

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The reports due on March 1 and September 1 shall be submitted with the semi-annual report required by Condition X.C.3.

(9 VAC 5-80-110 and Condition 21 of 3/31/03 Permit)

- 2. Each quarterly report shall document the following:
 - a. The monthly and rolling 12-month throughput in tons of total VOC used in print production for each press (P1 P5);
 - b. The monthly and rolling 12-month weight in tons of total VOC recovered or disposed of offsite.
 - (9 VAC 5-80-110 and Condition 21 of 3/31/03 Permit)
- 3. The permittee shall furnish written notification to the Director, Valley Region, of:
 - a. The actual start up date of Press No. 5 (P5) within 10 days after such date.
 - b. The actual date maximum production for Press No. 5 (P5) commenced within 15 days.
 - c. The anticipated date of performance tests of the incinerators (CD1 and CD2) serving Press Nos. 1 4 (P1 P4) (as required by Condition V.D.6) and of the incinerator (CD3) serving Press No. 5 (P5) (as required by Conditions V.D.2 and V.D.6), postmarked at least sixty (60) days prior to such dates.
 - (9 VAC 5-80-110, 40 CFR 63.7(b) and Condition 19 of 3/31/03 Permit)
- 4. Following completion of the performance tests required in Condition V.D.2, the permittee shall submit to the Director, Valley Region, a notification of compliance status for Press No. 5 (P5), signed by a responsible official who shall certify to its accuracy, attesting to whether the source has complied with 40 CFR 63 Subpart KK. A copy of the notification shall be submitted to the EPA at the address in Condition V.D.2. The notification shall list:
 - a. The methods that were used to determine compliance;
 - The results of any performance tests, opacity or visible emissions observations, CMS performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining continuing compliance, including a

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description of monitoring and reporting requirements and test methods;

- d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in 40 CFR 63 Subpart KK;
- e. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- f. For the capture efficiency CMS, a plan that
 - (1) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
 - (2) Discusses why the parameter is appropriate for demonstrating ongoing compliance; and
 - (3) Identifies the specific monitoring procedures;
- g. A statement by the permittee as to whether the source has complied with 40 CFR 63 Subpart KK.

The notification shall be sent before the close of business on the 60th day following the completion of the performance test. Any change in the information in the notification shall be provided to the Director, Valley Region, and a copy of such shall be provided to the EPA and postmarked within 15 calendar days after the change, as required by 40 CFR 63.9(j).

(9 VAC 5-80-110, 40 CFR 63.828(a)(5), 40 CFR 63.830(b)(3), and 40 CFR 63.9(h))

5. The permittee shall furnish the Director, Valley Region, a copy of a written report of the results of the CMS performance evaluation simultaneously with the results of the performance test. A copy of the report shall be sent to the EPA at the address in Condition V.D.2. The Director, Valley Region, or EPA may request that the owner or operator submit the raw data from the CMS performance evaluation in the report of the performance evaluation results.

(9 VAC 5-80-110 and 40 CFR 63.8(e)(4))

6. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall report the action

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as follows:

- Within two working days after commencing action inconsistent with the plan, the
 permittee shall report such action by telephone or facsimile transmission to the Director,
 Valley Region;
- b. The permittee shall submit a letter, delivered or postmarked within seven working days after the end of the event, that contains:
 - (1) The name, title, and signature of the responsible official who is certifying its accuracy;
 - (2) An explanation of the circumstances of the event and the reasons for not following the startup, shutdown, and malfunction plan;
 - (3) A statement as to whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

Additionally, a statement that actions inconsistent with the startup, shutdown, and malfunction plan were taken shall be included in the summary report required by Condition V.E.8.

(9 VAC 5-80-110, 40 CFR 63.830(b)(5), and 40 CFR 63.10(d)(5))

- 7. For those malfunctions or other events that affect the CMS and are not addressed by the startup, shutdown, and malfunction plan, the permittee shall report actions that are inconsistent with the startup, shutdown, and malfunction plan within 24 hours after commencing actions inconsistent with the plan. The permittee shall send a follow-up report within 2 weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The permittee shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond his or her control.
- 8. As required under 40 CFR 63.10(e)(3)(vii) and (e)(3)(viii), one summary report shall be submitted to the Director, Valley Region, semi-annually for the hazardous air pollutants monitored at the rotogravure presses (P1 P5). The summary report shall be entitled "Summary Report-Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and shall contain the following information:
 - a. The company name and address;

(9 VAC 5-80-110 and 40 CFR 63.8(c))

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- b. An identification of each hazardous air pollutant monitored at the rotogravure presses (P1 P5);
- c. The beginning and ending dates of the reporting period;
- d. A brief description of the process units;
- e. The emission and operating parameter limitations specified in 40 CFR 63 Subpart KK;
- f. The monitoring equipment manufacturer(s) and model number(s);
- g. The date of the latest CMS certification or audit;
- h. The total operating time of each rotogravure press (P1 P5) during the reporting period;
- i. An emission data summary (or similar summary if the permittee monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in hours), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;
- j. A CMS performance summary (or similar summary if the permittee monitors control system parameters), including the total CMS downtime during the reporting period (recorded in hours), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;
- k. A description of any changes in CMS, processes, or controls since the last reporting period;
- 1. Exceedances of the standards in 40 CFR 63.825
- m. If a startup, shutdown, or malfunction occurred during the reporting period, a statement as to whether actions taken in response were consistent with the startup, shutdown, and malfunction plan required by Condition V.A.8.

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n. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

o. The date of the report.

Once excess emissions are reported, the summary report shall be submitted quarterly as delineated in Condition V.E.10. Quarterly reporting shall be continued until a request to reduce reporting frequency according to 40 CFR 63.10(e)(3)(ii) is approved by the Director, Valley Region. A copy of the request shall be sent to EPA at the address in Condition V.D.2. Whether reports are submitted quarterly or semi-annually, appropriate submittal dates from schedule provided in V.E.1 shall be used. A copy of the report shall be sent to EPA at the address in Condition V.D.2.

(9 VAC 5-80-110, 40 CFR 63.830(b)(5), 40 CFR 63.830(b)(6)(i), 40 CFR 63.10(d)(5).

(9 VAC 5-80-110, 40 CFR 63.830(b)(5), 40 CFR 63.830(b)(6)(i), 40 CFR 63.10(d)(5), and 40 CFR 63.10(e)(3)(vi))

- 9. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is one (1) percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is five (5) percent or greater of the total operating time for the reporting period, the permittee shall submit an excess emissions and CMS performance report to the Director, Valley Region quarterly, as part of the summary report required by Condition V.E.8. A copy of the report shall be sent to EPA at the address in Condition V.D.2. Written reports of excess emissions or exceedances of process or control system parameters shall include the following:
 - a. The date and time identifying each period during which the CMS was inoperative;
 - b. The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);
 - c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in 40 CFR 63 Subpart KK, that occurs during startups, shutdowns, and malfunctions of the rotogravure presses;
 - d. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in 40 CFR 63 Subpart KK, that occurs during periods other than startups, shutdowns, and malfunctions of the rotogravure presses;
 - e. The nature and cause of any malfunction (if known);

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- The corrective action taken or preventive measures adopted;
- The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
- h. Information concerning out-of-control periods (as defined in 40 CFR 63.8(c)(7)), including start and end dates and hours and descriptions of corrective actions taken.

The report shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report. If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than one (1) percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than five (5) percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and CMS performance report need not be submitted unless required by the Director, Valley Region or EPA. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the summary report. Whether reports are submitted quarterly or semi-annually, appropriate submittal dates from schedule provided in V.E.1 shall be used. A copy of the report shall be sent to EPA at the address in Condition V.D.2.

- (9 VAC 5-80-110 and 40 CFR 63.10(e)(3))
- 10. Once the permittee reports excess emissions, a quarterly reporting format shall be followed until a request to reduce reporting frequency is approved. A request to reduce reporting frequency from quarterly to semi-annual may be made if the following conditions are met:
 - a. For one full year (e.g., four quarterly or 12 monthly reporting periods) the rotogravure presses (P1 - P5) excess emissions and CMS performance reports continually demonstrate that the source is in compliance with the emission limits listed in Condition V.A.6;
 - b. The permittee continues to comply with all recordkeeping and monitoring requirements specified in 40 CFR 63 Subpart KK; and
 - c. Neither the Director, Valley Region, nor the EPA objects to a reduced frequency of reporting.

The frequency of excess emissions or summary reports may be reduced only after the permittee notifies the Director, Valley Region, and the EPA in writing of the intention to make such a change and neither recipient objects to the intended change. If the Director, Valley Region or the EPA disapproves the intended change, the permittee will be notified of

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the disapproval within 45 days. (9 VAC 5-80-110 and 40 CFR 63.10(e)(3)(ii))

VI. Release Ink Production – Emission Process ID # RI

A. Limitations

- 1. Release ink production shall process no more than 1,220 tons of VOC per year, calculated monthly as the sum of each consecutive 12-month period.
 - (9 VAC 5-80-110 and Condition 10 of 3/31/03 Permit)
- 2. VOC emissions from release ink production shall not exceed 7.4 tons per year, calculated monthly as the sum of each consecutive 12-month period.
 - (9 VAC 5-80-110 and Condition 11 of 3/31/03 Permit)

B. Monitoring and Recordkeeping

1. Compliance with the annual VOC processing limit in Condition VI.A.1 shall be determined by calculating the VOC processed each calendar month as follows:

$$P = \frac{\sum_{i=1}^{i} G_i \mathbf{r}_i x_i}{2000}$$

Where

P = VOC processed during the calendar month (tons)

 G_i = number of gallons of each solvent i used for the calendar month

 ρ_i = density of each solvent i used

 x_i = weight percent VOC in each solvent i

The VOC content of each solvent shall be based on certified manufacturers' formulation data as shown on the Material Safety Data Sheet (MSDS) or on a VOC Data Sheet for each product. If a range of VOC content values is given, calculations shall be based on the maximum value.

(9 VAC 5-80-110)

2. Compliance with the annual VOC emission limit in Condition VI.A.2 shall be determined by calculating VOC emissions each calendar month as follows:

$$E = \frac{\sum_{n=1}^{i} F_{i} X_{i}}{2000}$$

Where

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E = VOC emissions (tons)

 F_i = VOC emission factor (lb/batch) specific to release ink type (clear, extender, pearl, white, or color)

 X_i = number of batches of each release ink type produced for each calendar month

Emission factors used for each type of release ink produced shall be documented and available for review by DEQ upon request.

(9 VAC 5-80-110)

- 3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the limits in Conditions VI.A.1 and VI.A.2, including but not limited to:
 - a. Throughput of VOCs (tons) used in release ink production, calculated monthly as the sum of each consecutive 12-month period;
 - b. VOC emissions (tons) from release ink production, calculated monthly as the sum of each consecutive 12-month period; and
 - c. Certified MSDS or VOC Data Sheet showing the VOC content as supplied for each raw material used in ink production.

The content of and format of such records shall be arranged with the Director, Valley Regional Office. These records shall be available for inspection by DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 and Condition 20 of 3/31/03 Permit)

C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations.

(9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 14 of 3/31/03 Permit)

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

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Pollutant	Test Method (40 CFR Part 60 Appendix A)	
VOC	Methods 18, 25, 25a	
VOC content	Methods 24, 24a	

(9 VAC 5-80-110)

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VII. Chromium Electroplating Process - Emission Unit ID#s E42 and E53

The following terms and conditions are the requirements of 40 CFR Part 63 Subpart N, as codified in a Minor NSR permit issued October 20, 2004. A current copy of 40 CFR Part 63 Subpart N has been attached. As used in this section, all terms shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.341.

A. Limitations

1. According to 40 CFR 63.342(c)(2)(i), emissions from the operation of the hard chromium plating tanks (E42 and E53) shall not exceed the limits specified below:

Total Chromium 0.

0.015 mg/dscm (6.6 x 10⁻⁶ gr/dscf)

The limitation applies during tank operation and periods of startup and shutdown. The limitation does not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by 40 CFR 63.342(f) and Condition VI.A.5 must be followed during malfunctions.

(40 CFR 63.342(c)(1)(i), 9 VAC 5-80-110 and Condition 9 of 10/20/04 Permit)

- Visible emissions from the composite mesh-pad system (CD4) exhaust stack shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during malfunction.
 (9 VAC 5-80-110, 9 VAC 5-50-80, and Condition 10 of 10/20/04 Permit)
- 3. Hexavalent chromium emissions from the chromium electroplating tanks (E42 and E53) shall be controlled by a composite mesh-pad system. The control device shall be provided with adequate access for inspection. The composite mesh-pad system shall be equipped with a device to continuously measure the differential pressure across the pads. The device shall be maintained by the permittee such that it is in proper working order at all times.

 (9 VAC 5-80-110 and Condition 3 of 10/20/04 Permit)
- 4. <u>Work Practice Standards</u> According to 40 CFR 63.342(f), the permittee shall develop and implement the following work practice standards:
 - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the chromium electroplating tanks (E42 and E53) and the composite mesh-pad system (CD4) and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions and with the operation and maintenance plan required by Condition VII.A.5.

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b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by Condition VII.A.5.

c. Operation and maintenance requirements established pursuant to section 112 of the Act (as required by Condition VII.A.5) are enforceable independent of emissions limitations or other requirements in relevant standards.

Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the DEQ, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of source. The DEQ may require that the permittee revise the operation and maintenance plan if deficiencies as described in 40 CFR 63.342(f)(2)(ii) are found.

(40 CFR 63.342(f), 9 VAC 5-80-110 and Condition 5 of 10/20/04 Permit)

- 5. <u>Operation and Maintenance Plan</u> According to 40 CFR 63.342(f)(3) the permittee shall prepare an operation and maintenance plan to be implemented at startup. The plan shall include the following:
 - a. The plan shall specify the operation and maintenance criteria for the chromium electroplating tanks (E42 and E53), the composite mesh-pad system (CD4), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
 - b. The plan shall incorporate the following work practice standards for the composite mesh-pad system (CD4):

	Work Practice Standards for Composite Mesh-Pad System	Frequency	
1.	Visually inspect device to ensure there is proper drainage, no		
	chromic acid buildup on the pads, and no evidence of chemical	1/quarter	
	attack on the structural integrity of the device.		
2.	Visually inspect back portion of the mesh pad closest to the fan to	1/quarter	
	ensure there is no breakthrough of chromic acid mist	1/quarter	
3.	Visually inspect ductwork from the tank to the composite mesh-	1/guartar	
	pad system to ensure there are no leaks.	1/quarter	
4.	Perform washdown of the composite mesh-pads in accordance	Per manufacturer's	
	with manufacturer's recommendations	recommendation	

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c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.

- d. The plan shall include a systematic procedure for identifying malfunctions of process equipment (E42 and E53), the composite mesh-pad system (CD4), and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.
- e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment (E42 and E53), composite mesh-pad system (CD4), or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
- f. If the actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report by telephone such actions to the Director, Valley Region, within two (2) working days after commencing actions inconsistent with the plan. The report shall be followed by a letter within seven (7) working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Director, Valley Region and the EPA.
- g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by an authorized representative of the Valley Regional Office or by the EPA, for the life of the hard chromium electroplating tank(s) (E42 and E53) or until the source is no longer subject to the provisions of 40 CFR 63 Subpart N.
- h. Additionally, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection, upon request, by an authorized representative of the Valley Regional Office, or by the EPA, for a period of five (5) years after such revision to the plan.
- i. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided that alternative plans meet the requirements of 40 CFR 63.342(f)(3). (40 CFR 63.342(f)(3), 9 VAC 5-80-110 and Condition 6 of 10/20/04 Permit)

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6. **Permit Invalidation -** The permit to construct a hard chromium electroplating tank (Unit Ref. # 53) shall become invalid, unless an extension is granted by the DEQ, if:

- a. A program of continuous construction is not commenced before the latest of the following:
 - (1) 18 months from the date of this permit;
 - (2) Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
 - (3) Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
- b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-110 and Condition 15 of 10/20/04 Permit)

B. Monitoring

- 1. The composite mesh-pad system (CD4) shall be provided with adequate access for inspection. The composite mesh-pad system (CD4) shall be equipped with a device to continuously measure the differential pressure through the pads.
 - (9 VAC 5-80-110 and Condition 3 of 10/20/04 Permit)
- 2. On or after the date on which the initial performance test is required to be completed, the permittee shall demonstrate continuous compliance, according to 40 CFR 63.343 (c)(1), by monitoring and recording the differential pressure across the composite mesh-pad system (CD4) once each day that either chromium plating tank (E42 or E53) is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ± 2 inches of water column of the pressure drop value established during the most recent performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. As described in 40 CFR 63.343(c)(8), requests and approvals of alternative monitoring methods shall be considered by the EPA in accordance with 40 CFR 63.8(f)(1), (f)(3), (f)(4), and (f)(5). The requirement to operate a composite meshpad system within the range of pressure drop values established during performance testing does not apply during automatic washdown cycles of the composite meshpad system.

(40 CFR 63.343(c), 40 CFR 63.8(f), 9 VAC 5-80-110 and Condition 8 of 10/20/04

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3. The permittee shall perform weekly inspections of the stack of the composite meshpad system (CD4) serving the chromium electroplating tanks (E42 and E53) to determine the presence of visible emissions. If during the inspection, or at any other time, visible emissions are observed, an EPA Method 9 (40 CFR 60, Appendix A) visible emission evaluation (VEE) shall be conducted by a certified observer. The VEE shall be conducted for a minimum period of six (6) minutes. If any of the observations exceed five percent opacity, the observation period shall continue until sixty (60) minutes of observation have been completed. If the sixty-minute VEE indicates a violation of the standard, corrective action shall be taken.

(9 VAC 5-80-110)

C. Recordkeeping

According to 40 CFR 63.10(b)(1) and 40 CFR 63.346, the permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- 1. Inspection records for the composite mesh-pad system (CD4) and monitoring equipment to document that the inspection and maintenance required by the work practice standards listed in 40 CFR 63.342 and Condition VII.A.5 have taken place. The records can be in the form of checklists and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
- 2. Records of all maintenance performed on the chromium electroplating tanks (E42 and E53), the composite mesh-pad system (CD4), and the monitoring equipment;
- 3. Records of the occurrence, duration, and cause (if known) of each malfunction of process (E42 or E53), composite mesh-pad system (CD4), and monitoring equipment;
- 4. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan required by 40 CFR 63.342(f)(3) and Condition VII.A.5;
- 5. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan as delineated in 40 CFR 63.342(f)(3) and Condition VII.A.5;

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- 6. Test reports documenting results of all performance tests;
- 7. All measurements as may be necessary to determine the conditions of performance tests;
- 8. Records of the monitoring data required by 40 CFR 63.343(c) and Condition VII.B.1 that are used to demonstrate compliance with the standard, including the date and time the data are collected;
- 9. Specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data required by Condition VII.B.1, that occurs during malfunction of the process (E42 or E53), composite mesh-pad system, or monitoring equipment;
- 10. Specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data required by Condition VII.B.1, that occurs during periods other than malfunction of the process (E42 or E53), composite mesh-pad system (CD4), or monitoring equipment;
- 11. The total process operating time of the electroplating tanks (E42 and E53) during the reporting period;
- 12. All documentation supporting the notification and reports required by Conditions VII.D.2 and VII.E.4.

The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, computer, computer floppy disks, magnetic tape disks, or microfiche.

(40 CFR 63.10(b)(1), 40 CFR 63.342(f), 40 CFR 63.343(c), 40 CFR 63.346, 9 VAC 5-80-110 and Condition 11 of 10/20/04 Permit)

D. Testing

1. Each chromium electroplating tank (E42 and E53) shall be constructed in accordance with the guidelines in 40 CFR 63.7(d) so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.

(40 CFR 63.7(d), 9 VAC 5-80-110 and Condition 4 of 10/20/04 Permit)

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2. According to 40 CFR 63.7, 63.343(b), and 63.347(f), initial performance tests shall be conducted for hexavalent chromium from the composite mesh-pad system (CD4) exhaust stack to determine compliance with the emission limits contained in Condition VII.A.1. The tests shall establish the pressure drop across the system as a site-specific operating parameter for the control device as delineated in 40 CFR 63.343(c)(1). The tests shall be performed, and demonstrate compliance, within 60 days after achieving the maximum production rate but in no event later than 180 calendar days after start-up of the second chromium tank (E53). Tests shall be conducted and reported, operating parameter values established, and data reduced as set forth in 9 VAC 5-60-30 of State Regulations and the test methods and procedures contained in 40 CFR 63.344. The details of the tests are to be arranged with the Director, Valley Region. The permittee shall notify the Director, Valley Regional Office, and EPA at the address below of the intention to conduct the performance test at least 60 calendar days before the test is scheduled to begin. The permittee shall submit a test protocol to the Director, Valley Region, at least thirty (30) days prior to testing. A copy of the test results shall be submitted to the Director, Valley Region within 60 days after test completion and shall conform to the test report format enclosed with this permit. A copy of the test results shall also be submitted to EPA at the address below no later than 90 calendar days after test completion and shall be included as part of the notification of compliance status (as required by Condition VII.E.2:

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

According to 40 CFR 63.7(a)(3), the Department of Environmental Quality (DEQ) may require the permittee to conduct performance tests on the control device (CD4) for the chromium electroplating tanks (E42 and E53) at any other time when the action is authorized by section 114 of the Clean Air Act.

(40 CFR 63.7, 40 CFR 63.343(b), 40 CFR 63.343(c), 40 CFR 63.344, 40 CFR 63.347(f), 9 VAC 5-80-110 and Condition 7 of 10/20/04 Permit)

3. If testing is conducted in addition to that specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

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Pollutant	Test Method
Total chromium	(40 CFR Part 63, Appendix A)
	EPA Methods 306 or 306A
Visible Emission	(40 CFR Part 60, Appendix A)
	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

- 1. The permittee shall furnish written notification to the Director, Valley Regional Office:
 - a. The actual date on which construction of the chromium-electroplating tank (Unit Ref. # 53) commenced within 30 calendar days after such date.
 - b. The actual start-up date of the chromium electroplating tank (Unit Ref. # 53) within 15 days after such date.

Copies of the written notification referenced in items a through b above shall be sent to EPA at the address provided in Condition VII.D.2.

- (9 VAC 5-80-110 and Condition 13 of 10/20/04 Permit)
- 2. <u>Notification of Compliance Report</u> According to 40 CFR 63.347(e), upon completion of the performance test required by Condition VII.D.2, the permittee shall submit to the Director, Valley Region, a notification of compliance status, signed by a responsible official (as defined in 9 VAC 5-20-230) who shall certify its accuracy, attesting to whether the source has complied with 40 CFR 63 Subpart N. The notification shall list:
 - a. The applicable limitation and the methods that were used to determine compliance with the limitation in Condition VII.A.1;
 - b. The results of the performance test, containing the elements required by 40 CFR 63.344(a);
 - c. The type and quantity of hazardous air pollutants emitted by the source, reported in milligrams per dry standard cubic meter (mg/dscm) and in accordance with the test methods specified;

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d. For each monitored parameter for which a compliant value is to be established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;

- e. The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements;
- f. A description of the air pollution control technique;
- g. A statement that the permittee has completed and has on file the operation and maintenance plan as required by Condition VII.A.5;
- h. A statement by the permittee as to whether the facility has complied with the provisions of 40 CFR 63 Subpart N.

The notification shall be submitted to the Valley Regional Office and a copy of such submitted to the EPA at the address indicated in Condition VII.D.2 no later than 90 calendar days following completion of the compliance demonstration. Any change in the information in the notification shall be provided to the Director, Valley Region, and a copy of such shall be provided to the EPA at the address provided in Condition VII.D.2 and postmarked within 15 calendar days after the change, as required by 40 CFR 63.9(j). (40 CFR 63.344(a), 40 CFR 63.347(e), 40 CFR 63.9(j), 9 VAC 5-80-110 and Condition 14 of 10/20/04 Permit)

- 3. <u>Ongoing Compliance (Summary) Reports</u> According to 40 CFR 63.347(g), the permittee shall prepare a summary report to document the ongoing compliance status. When more than one monitoring device is used to comply with the continuous compliance monitoring required by Condition VII.B.2 and 40 CFR 63.343(c), the permittee shall report the results as required for each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the permittee shall only report the results from the monitoring device used to meet the monitoring requirements of 40 CFR 63 Subpart N. The report shall contain the following information:
 - a. The company name and address;
 - b. An identification of the operating parameter that is monitored for compliance determination;
 - c. The relevant emission limitation for the chromium electroplating tanks (E42 and E53) and the operating parameter value, or range of values, that correspond to compliance

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with this emission limitation as specified in the notification of compliance status required by Condition VII.E.2;

- d. The beginning and ending dates of the reporting period;
- e. A description of the type of process performed in the chromium electroplating tanks (E42 and E53);
- f. The total operating time of the chromium electroplating tanks (E42 and E53) during the reporting period;
- g. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- h. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in Conditions VII.A.4 and VII.A.5 and § 63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- i. If the operation and maintenance plan required by Condition VII.A.5 and § 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by § 63.342(f)(3)(iv) and Condition VII.A.5.f documenting that the operation and maintenance plan was not followed;
- j. A description of any changes in monitoring, processes, or controls since the last reporting period;
- k. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- l. The date of the report.

This report shall be submitted on March 1 and September 1 to the Director, Valley Region, and a copy shall be submitted to the EPA at the address indicated in Condition VII.D.2. However, if the monitoring data collected in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, reports shall be

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submitted quarterly, until a request to reduce reporting frequency as described in 40 CFR 63.347(g)(2) is approved.

(40 CFR 63.2, 40 CFR 63.342(f), 40 CFR 63.347(g), 9 VAC 5-80-110 and Condition 12 of 10/20/04 Permit)

4. The permittee shall furnish written notification to the Director, Valley Region, as required by 40 CFR 63.347(d)(1), of the anticipated date of performance tests of the add-on air pollution control device (CD4) postmarked at least sixty (60) days prior to such date. A copy of the notification shall be furnished to the EPA at the address provided in Condition VII.D.2. If the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond the permittee's control, the permittee shall notify the Director, Valley Region, and the EPA within five days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. The notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other applicable federal, state, or local requirement, nor will it prevent the Director, Valley Region, or the EPA from taking enforcement action under the Clean Air Act.

(40 CFR 63.347(d), 9 VAC 5-80-110 and Condition 13 of 10/20/04 Permit)

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VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
15	Fulton natural gas boiler for distillation units	9 VAC 5-80-720 C.2.a	n/a	0.19 MMBtu/hr
16	Propane liquid to gas converter	9 VAC 5-80-720 C.2.a	n/a	0.25 MMBtu/hr
17	Gluers for transwide product maker	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	40 ft/min
18	Rag squeezer	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	n/a
19	Varnish mixing tanks (2)	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	375 and 150 gal
21	Ink production dispenser	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	1,500 gal/day
22	Ink storage tanks (11)	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	2 @ 400 gal 9 @ 150 gal
24	Production dispenser filter washer	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	55 gal
25	Primary ink preparation area (including GMS)	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	n/a
26	Hazardous waste drum filling/storage	9 VAC 5-80-720 B.2, 5	VOCs, organic HAPs	n/a
27	MEK/toluene vertical aboveground storage tank	9 VAC 5-80-720 B.2, 5	VOCs, MEK, toluene	10,000 gal
28	Denatured ethanol vertical aboveground storage tank	9 VAC 5-80-720 B.2	VOCs	10,000 gal
29	Ethyl acetate horizontal aboveground storage tank	9 VAC 5-80-720 B.2, 5	VOCs	5,000 gal

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
30	n-Propanol horizontal aboveground storage tank	9 VAC 5-80-720 B.2	VOCs	5,000 gal
31	Isopropanol horizontal aboveground storage tank	9 VAC 5-80-720 B.2, 5	VOCs	1,000 gal
32	Propane horizontal aboveground storage tanks (2)	9 VAC 5-80-720 B.2	VOCs	1,000 gal (each)
33	Distilled MEK/toluene aboveground storage tank	9 VAC 5-80-720 B.2, 5	VOCs, MEK, toluene	2,200 gal
34	Distilled denatured ethanol aboveground storage tank	9 VAC 5-80-720 B.2	VOCs	2,200 gal
35	Dark MEK/toluene aboveground storage tank	9 VAC 5-80-720 B.2, 5	VOCs, MEK, toluene	2,200 gal
36	Dark denatured ethanol aboveground storage tank	9 VAC 5-80-720 B.2	VOCs	2,200 gal
37	Distillation units for dark solvent (3)	9 VAC 5-80-720 B.2, 5	VOCs, MEK, toluene	1 @ 100 gal 2 @ 55 gal
38	Catalytic incinerator (control device #1) natural gas burners	9 VAC 5-80-720 C.2.a	Crtieria pollutants, HAPs	8.9 MMBtu/hr
39	Catalytic incinerator (control device #3) natural gas burners (not yet constructed)	9 VAC 5-80-720 C.2.a	Crtieria pollutants, HAPs	4.0 MMBtu/hr
40	Natural gas space heaters (13)	9 VAC 5-80-720 C.2.a	n/a	4 @ 0.460 MMBtu/hr 3 @ 0.500 MMBtu/hr 2 @ 0.397 MMBtu/hr 2 @ 0.050 MMBtu/hr 1 @ 0.730 MMBtu/hr 1 @ 0.030 MMBtu/hr
41	Forklifts (3) – propane operated	9 VAC 5-80-720 A.23	Criteria pollutants, HAPs	N/A
43	Nickel electroplating	9 VAC 5-80-720 B.1	Nickel, PM-10	300 Amp-hrs/hr

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Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
44	Chromium deplating	9 VAC 5-80-720 B.1	Chromium III, PM-	200 Amp-hrs/hr
45	Degreasing (1)	9 VAC 5-80-720B	Negligible	NA
46	Manual degreasing and washing (2)	9 VAC 5-80-720 B.2	VOCs	NA
47	Copper electroplating (3)	9 VAC 5-80-720 B.1	Copper, PM-10	2,000 Amp-hrs/hr (each)
48	Turning and polishing	9 VAC 5-80-720 B.2,5	VOCs, HAPs	NA
49	Silver plating and degreasing	9 VAC 5-80-720 B.1	Silver, PM-10	1,500 Amp-hrs/hr
50	Wastewater pretreatment system	9 VAC 5-80-720B	Negligible	10 gal/min
51	Ink Jet Printers (2)	9 VAC 5-80-720 B 2, 5	VOCs, organic HAPs	3.2 meters/hr
52	Ink Jet Printers (8)	9 VAC 5-80-720 B 2, 5	VOCs, organic HAPs	9.6 meters/hr
54	n-Propyl acetate horizontal aboveground storage tank	9 VAC 5-80-720 B.2	VOCs	2,000 gal

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

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IX. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of applicability
9 VAC 5 Chapter 40 Article 3` (Rule 4-31)	Emission Standards for Paper and Fabric Coating Application Systems	Rule applies only to facilities located in VOC control areas. Transprint is not located in a VOC control area. Additionally, Transprint conducts printing, not coating, operations.
40 CFR Part 60 Subpart Kb	New Source Performance Standards for Volatile Organic Liquid Storage Vessels	The minimum tank capacity to which the subpart applies is 19,812.9 gallons. All storage tanks at the Transprint facility have capacities below the threshold.
40 CFR Part 63 Subpart EEEE	National Emission Standards for Hazardous Air Pollutants from Organic Liquids Distribution	Storage tank standards apply to tanks containing organic liquids having an annual average true vapor pressure of 4 psia or more; Transprint's tanks store liquids having true vapor pressures below the minimum threshold. Transfer operation standards apply to facilities that transfer organic liquids out of the facility; Transprint does not transfer solvents out of the facility.
40 CFR Part 63 Subpart HHHHH	National Emission Standards for Hazardous Air Pollutants from Miscellaneous Coating Manufacturing	Applies to process vessels containing liquids having HAP concentration greater than five percent by weight; Transprint's ink mixing units contain liquids having HAP concentrations below the minimum threshold.

Nothing in this permit shield shall alter the provisions of § 303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to § 114 of the federal Clean Air Act, (ii) the Board pursuant to § 10.1-1314 or § 10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to § 10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

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X. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable. (9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

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5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

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- b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
- (1) Exceedance of emissions limitations or operational restrictions;
- (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
- (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than <u>March 1</u> each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

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5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Valley Region, within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition X.C.3. of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Valley Region, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or

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malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Valley Region.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit. (9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Action for Cause

 This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(9 VAC 5-80-110 G & L, 9 VAC 5-80-240 and 9 VAC 5-80-260)

- 2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:
 - a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air

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pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;

- b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
- c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
- d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
- e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
- f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
- g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

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2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited, to the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

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(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the Administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

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3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the Board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F 2 to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

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4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80, Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substance subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

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Z. Accidental Release Prevention

If the permittee has more, or will have more, than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)